

11-CV-00037-M

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON AT TACOMA

ENPAC, LLC, an Ohio limited liability company
, an Ohio limited

Plaintiff,

v.

CHASSIDY F. LUCAS, individually and CB
STORMWATER LLC d/b/a STORMWATER LLC,
A Washington limited liability company.

Defendants.

Civil Action No. 11-cv-37

MOTION TO SET ASIDE
DEFAULT

April 13, 2011

In response to MINUTE ORDER, I Chassidy F. Lucas Graciously am requesting for motion to set aside the default ordered on March 31, 2011.

At this time I would like to notify the Court that I moved residence during January 2011, this has caused a lot of interruption in the ability to receive crucial documentation regarding this matter.

I notified the courts and Attorney Larwrence Graham upon receiving mail that had been rerouted and redirected to me via U.S. Postal Service. Since my current physical address shall make known to the Courts be **284 Watershed Rd. Port Angeles Wa**, and my mailing address shall make known to the Courts be **PO BOX 39647 Lakewood WA 98496**

1 **PO BOX 39647 Lakewood WA 98496**, is the address I notified the United States District
2 Courthouse for record while during my relocating and has been the only place that I have been
3 able to receive court documentation for timely response.

4 Upon receiving several "forwarded" time sensitive court documents at my correct PO BOX on
5 file weeks later I discovered that mail had been sent to the following three addresses:

6 **1) PO BOX 39644 Lakewood Washington 98478** – which for record has never been affiliated
7 to myself or business and am unsure of how this is address is on file per my behalf.

8 **2) 30910 40th Ave S. Roy Washington** – A prior residence

9 **3) 1 st Helens Avenue Apt. 403 Tacoma WA 98402** – A prior residence

10 NONE of these are my PO BOX 39647 Lakewood Washington which I notified the United
11 States District Court.

12 Upon finding late documentations I notified both the Courts and Lawrence Graham to be updated
13 for fair advantages. According to the U. S. Postal Service Lawrence Graham had been sent
14 several notifications "Notify Sender of New Address"

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16 As follows in EXHIBIT "Y"

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EXHIBIT Y

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STORMWATER PURE

From our passion, we create pure water to care

PO Box 39647 Lakewood, WA 98496
Office: (360) 417-5205 Fax: (360) 417-5207
Toll Free (855) 417-5205
WWW.STORMWATERPURE.COM

Fax

To:	Lawrence Graham	From:	CB Stormwater LLC
Phone:	(206) 381-3300	Pages:	(3)
Fax:	(206) 381-3301	Date:	3/11/11
Re:		cc:	

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

To Whom it may concern,

Your company has sent correspondences to (3) different addresses except for the one on our header that has been faxed and mailed on every occasion. There is no reason why any correspondences be sent to 1 St Helens since this is a long time discontinued address and / or 30910 40th Ave which is also a discontinued address. You have even sent mail to an unknown PO Box that does not have any affiliation to our company. Should you need to correspond, please pay special care to the information provided on our letterhead since this is the **ONLY** way that we are able to receive mail. And this is the **ONLY** address we have ever made clear to your firm.

Thank You..

CB Stormwater LLC

CERTIFICATE OF SERVICE

I certify that on March 2, 2010, a true copy of the foregoing was sent via U.S. mail addressed as follows:

Chassidy F. Lucas
CB Stormwater LLC
P O Box 39644
Lakewood, WA 98478


Chassidy F. Lucas
CB Stormwater LLC
30910 40th Avenue South
Roy, WA 98580

s/ Sarah Gist

NOTICE OF CORRECTED NOTING DATE - 3

Civil Action No. 11-cv-37BHS
NPAC-6-1001P08RENOTE

BLACK LOWE & GRAHAM


701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301

CERTIFICATE OF SERVICE

I hereby certify on February 4, 2011 that a true copy of the foregoing was sent via U.S. mail addressed as follows:

Chassidy F. Lucas
CB Stormwater LLC
1st Helens Avenue, Apt 403
Tacoma, WA 98402

Chassidy F. Lucas
CB Stormwater LLC
30910 40th Avenue South
Roy, WA 98580

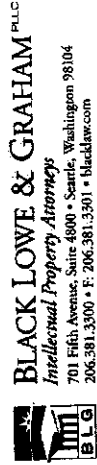
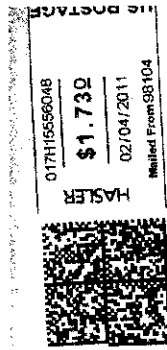
s/ Sarah Gist

MOTION FOR ENTRY OF DEFAULT - 3

Civil Action No. 11-cv-37BHS
NPAC-6-1001P04MD

BLACK LOWE & GRAHAMTM

701 Fifth Avenue, Suite 4800
Seattle, Washington 98104
206.381.3300 • F: 206.381.3301




BLACK LOWE & GRAHAM ^{PLLC}
Intellectual Property Attorneys
701 Fifth Avenue, Suite 4800 • Seattle, Washington 98104
206.381.3300 • F: 206.381.3301 • blacklaw.com

Chassidy F. Lucas
CB Stormwater LLC
30910 40th Avenue South
Roy, WA 98580

LUCAS910 • 985802042 1111 12 03/02/11
NOTIFY ADDRESS OF NEW ADDRESS
LUCAS, CHASSIDY
PO BOX 19147
LAKEWOOD WA 98496-3647



 **BLACK LOWE & GRAHAM** ^{PLLC}
Intellectual Property Attorneys
701 Fifth Avenue, Suite 4800 • Seattle, Washington 98104
206.381.3300 • F: 206.381.3301 • blacklaw.com

SEATTLE WA 98104
25 FEB 2011 PM 8:11

Chassidy F. Lucas
CB Stormwater LLC
30910 40th Avenue South
Roy, WA 98580

INT

984 N7E 1 1111 00 02/27/11
NOTIFY SENDER OF NEW ADDRESS
:CB STORMWATER LLC
PO BOX 39547
LAKEWOOD WA 98496-3547
BC: 98496354747 *2425-18131-25-40

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umbull

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1 At this time I am still unsure if I have received all documentations, per case No. C11-0037BHS
2 and am graciously requesting the Honorable Benjamin H. Settle to remove the default order due
3 to unfair receipt of time sensitive materials.

4 Not only has Lawrence Graham knowingly directed these time sensitive documents to random
5 discontinued address but also has involved his close colleagues "Newman and Newman" To
6 cause interference on Enpac behalf while in the defense of my intellectual property rights. Every
7 time I have attempted to contact Lawrence Graham I have been disregard with no call back and
8 all communications have only been eventually through the Court. I would like to request that
9 Lawrence Graham be removed and Enpac find a more professional attorney to represent this
10 case.

11 Today I am asking the Honorable Benjamin H. Settle to grant my request in continuing motion
12 for preliminary injunction.

13 And to allow myself Dr. Chassidy Lucas as power of Attorney to represent my intellectual rights
14 at this time in this argument and to allow for the courts to clearly co- respond in order for me to
15 fairly represent myself in the most time sensitive manner in release of information as to how I
16 can be directly contacted.

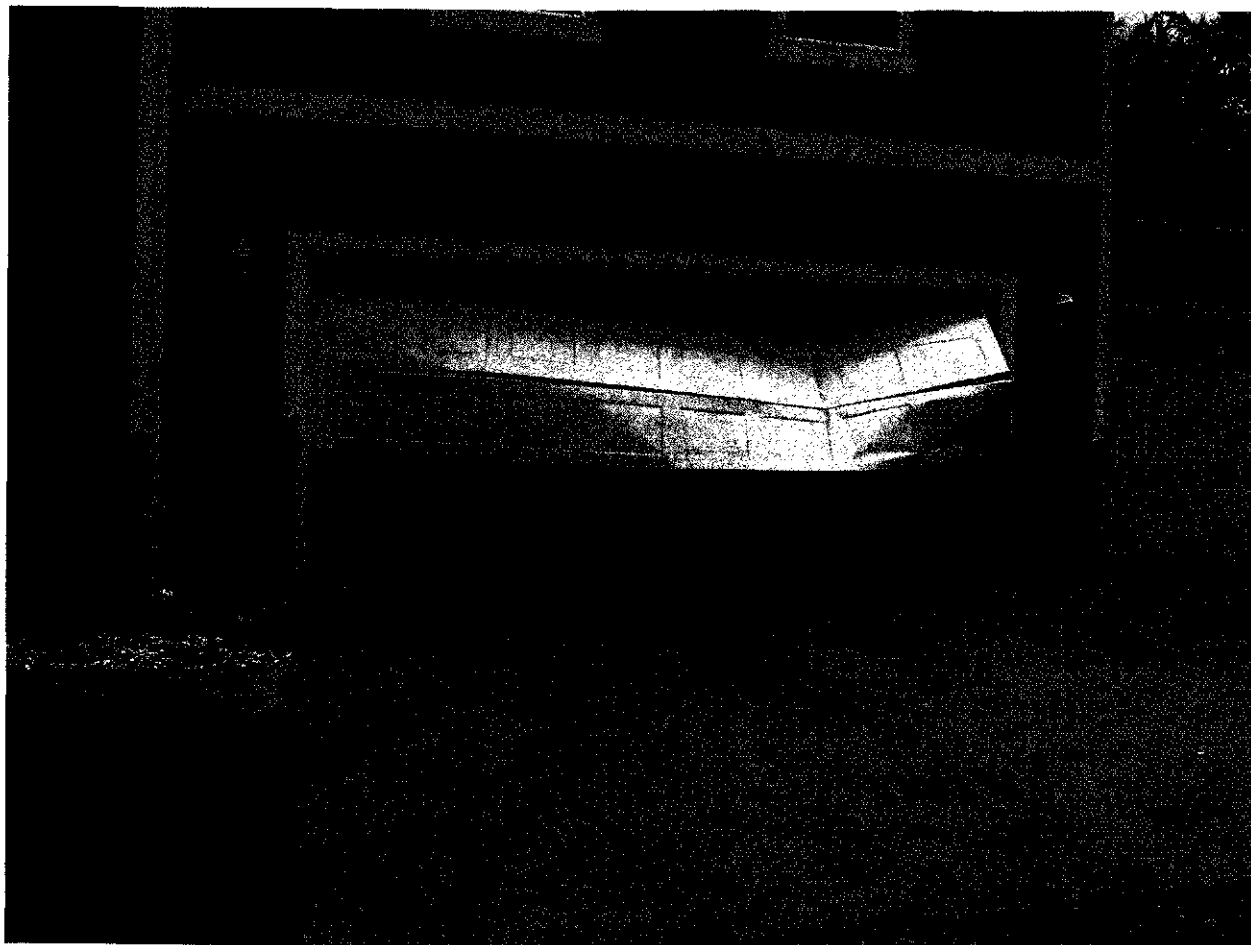
17 I would also like to request a permanent restraining order per Timothy Reed and his associates
18 upon the disclosure of my most current residence due to my fear of and having to vacate my
19 prior residence of, after witnessing several individuals taking photographs and stalking my home
20 during the engagement with Enpac and this case. Not long after my vacating of the 30910
21 address I was recently notified that there had been vandalism to my past residence, which I have
22 enclosed photographs of an attempt to harm. This is not the first time I have been attacked upon
23 disclosure of my whereabouts, on another occasion my office was literally burned to the ground.
24 I take these situations severely due to internet harassment by Enpac and reputation of. I am
25 asking the Court to honor this permanent restraining order while further preceding this case
26 while therefore I may defend myself in a timely manner. Enpac "Tim Reed" has caused many
27 setbacks and even informed me prior to this case that he would be "very aggressive" while taking
28 internal approaches attacking me while in process of. Enpac has a history of bribery, and illegal
29 business practice therefore this protection order is imperative.

30 See my vacated residence 30910 40th Ave S Roy WA since engagement with Enpac case, and
31 reason for restraining order. Exhibit "Z"

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EXHIBIT Z

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2 RESPECTFULLY SUBMITTED this 13th Day of April, 2011

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4 Dr. Chassidy Lucas

5 PO BOX 39647

6 Lakewood WA. 98496

7 Email dr.chassidylucas@stormwaterpure.com

8 T: (360) 417-5205

9 F: (360) 417 – 5207

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CERTIFICATE OF SERVICE

I certify that on April 13, 2011 a true copy of the foregoing was sent via U.S. mail addressed as follows:

Black Lowe & Graham
701 Fifth Avenue , Suite 4800
Seattle, WA 98104